

ORIGINAL
FILE

VINCENT A. PEPPER
ROBERT F. CORAZZINI
PETER GUTMANN
WILLIAM J. FRANKLIN
JOHN F. GARZIGLIA
TODD J. PARRIOTT
NEAL J. FRIEDMAN
ELLEN S. MANDELL
HOWARD J. BARR
LOUISE CYBULSKI *
JENNIFER L. RICHTER *
* NOT ADMITTED IN D.C.

PEPPER & CORAZZINI

ATTORNEYS AT LAW
200 MONTGOMERY BUILDING
1776 K STREET, NORTHWEST
WASHINGTON, D. C. 20006
(202) 296-0600

ROBERT LEWIS THOMPSON
GREGG P. SKALL
E. THEODORE MALLYCK
OF COUNSEL
FREDERICK W. FORD
1909-1986
TELECOPIER (202) 296-5572

September 15, 1992

RECEIVED

SEP 15 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


Re: Docket 92-155
RM 8020
Counterproposal and Request for
Order to Show Cause

Dear Ms. Searcy:

Transmitted herewith on behalf of Ames Broadcasting Company, licensee of Station KCCQ, Ames, Iowa, is an original and four (4) copies of its Counterproposal and Request for Order to Show Cause to the Notice of Proposed Rule Making, 7 FCC Rcd. 4590 (1992) in the above-referenced proceeding. Kindly refer this to the Chief, Allocations Branch.

Should you or the staff have any questions regarding this matter, kindly contact the undersigned.

Sincerely,


Gregg P. Skall
Counsel for
Ames Broadcasting Company

Enclosures

No. of Copies rec'd 079
LWABODE

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED
SEP 15 1992
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of)	
Section 73.202(b))	MM Docket 92-155
Table of Allotments)	
FM Broadcast Stations)	RM - 8020
(Blair, Nebraska;)	
Storm Lake, Perry, and)	
Sac City, Iowa))	

TO: Chief, Allocations Branch

COUNTERPROPOSAL AND REQUEST FOR ORDER TO SHOW CAUSE

Ames Broadcasting Company ("Ames") licensee of Station KCCQ, Ames, Iowa, by its counsel and pursuant to Section 1.420(d) of the Rules of the Commission, hereby submits a counterproposal to the Notice of Proposed Rule Making ("Notice"), 7 FCC Rcd. 4590 (1992), in the above-captioned proceeding. The Notice proposed to upgrade Station KBWH(FM), Blair, Nebraska, from Channel 292A to Channel 268C3 in response to a petition filed by Sunrise Broadcasting of Nebraska, Inc. ("Sunrise"), and to modify the license of Station KBWH to specify Channel 268C3. To accommodate the allotment of Channel 268C3 to Blair, Sunrise also requested a modification of Station KAYL(FM), Storm Lake, Iowa, from Channel 268C1 to Channel 269C1, modification of Station KDLS-FM, Perry, Iowa, from Channel 269A to Channel 286A, and the substitution of Channel 248A for unoccupied and unapplied for Channel 286A at Sac City, Iowa.

As a counterproposal, Ames requests the substitution of Channel 286C3 for 296A at Ames, Iowa, the modification of Station

KCCQ(FM)'s license to specify operation on Channel 286C3, and the allocation of Channel 296C3 to Lake City, Iowa, a community for which there is no present FM channel allotment and for which one may be made available only by grant of the requested channel modification for Ames, Iowa. To accommodate the allotment of Channel 286C3 to Ames and 296C3 to Lake City, petitioner also requests the modification of Station KDLS' license by substituting Channel 288A for Channel 269A (rather than Channel 286A) at Perry, Iowa, and the modification of Station KDSN(FM)'s license by substituting Channel 256A for Channel 296A at Dennison, Iowa. Further, Ames concurs in the modifications requested by petitioner for substituting Channel 248A for 286A at Sac City, Iowa, substituting Channel 269C1 for 268C1 at Storm Lake, Iowa, and substituting Channel 268C3 for Channel 292A at Blair, Nebraska. Ames requests the issuance of an Order to Show Cause to modify the license of Stations KDSN(FM) and a further Order to Show Cause to modify the license of Station KDLS-FM, Perry, Iowa, to permit the channel reallocation specified above. The requested allotments and modifications to the Notice are summarized by Table 1.

City	Station	Present Channel	Blair Proposal	KCCQ Proposal
Blair, NB	KBWH(FM)	292A	268C3	268C3
Ames, IA	KCCQ(FM)	296A		286C3
Perry, IA	KDLS-FM	269A	286A	288A
Sac City, IA	Unoccupied	286A	248A	248A
Storm Lake, IA	KAYL(FM)	268C1	269C1	269C1
Dennison, IA	KDSN(FM)	296A		256A
Lake City, IA				296C3

Table 1

In support hereof, Ames states as follows:

Ames, Iowa

As indicated in Exhibit 1 to this Counterproposal, Channel 286C3 can be allotted to Ames, Iowa, in accordance with Section 73.207 of the Commission's Rules, at coordinates 42° 04' 05" North - 93° 38' 13" West. A comparison of the area and population served by the service grade contours of KCCQ at present, compared to the service it could provide as a regional service Class C3 facility, as requested in this Counterproposal, reveals an increase in KCCQ's area served of 2,279 kilometers representing a population gain to the service area of 41,397. Expressed as a percentage, these numbers would increase the service area by 91.9% and the population served by 44%. Ames states that it has a present intention to apply to modify Station KCCQ's license to specify operation on the higher powered Channel 286C3, and to immediately construct pursuant to a construction permit if the reallocation and modification requested herein is ordered.

Lake City, Iowa

As indicated on the Channel Study attached as Exhibit 1, the Ames Counterproposal would also provide Lake City, Iowa, with a first aural full-time regional broadcast service. Based on 1990 U.S. Census data, Lake City has a population of 1841 persons. The regional aural broadcasting service proposed would provide service within its 60 dbu (1 mv per meter) signal coverage to an area of approximately 4782 square kilometers, covering a population of 43,208 persons. Ames has a present intention to apply for Channel 296C3 in Lake City, Iowa, and if authorized, to build a station promptly.

Discussion

Ames' Counterproposal would require substitution of Channel 288A at Perry, Iowa in lieu of Channel 286A as proposed in the Notice. "A notice of proposed rulemaking in a channel allotment proceeding specifically elicits counterproposals and alerts all interested parties that alternate channels may be substituted for ... the original proposal." Pinewood, South Carolina, 68 RR2d 1124, 1125 (1990). Ames' Counterproposal is, therefore, within the scope of the Notice. Id.^{1/} The merits of Ames' Counterproposal are established by recognizing that, as a result of the

^{1/} KDLS can be reallocated to Channel 288A with full channel spacing as shown on the attached Engineering Exhibit E. It should be noted that Station KELR-FM, Chirton, Iowa, and Station KNOD, Harlan, Iowa, have each been ordered to upgrade to Channels 287C2 and Channel 287C3 respectively. Upon notification to the Commission that such channel changes have been completed, Channel 288 is open and available for Perry.

increased service area of KCCQ combined with the new station at Lake City, the Ames proposal would result in new or expanded service to a population of 84,605 persons and gain in area served of 7061 square kilometers over the unmodified Blair proposal. See Greenup, Kentucky and Athens, Ohio, 2 FCC Rcd. 4319 (M.M. Bur. 1987); recon. granted on other grounds, 4 FCC Rcd. 3843 (M.M. Bur. 1989).

The difference of an additional 84,605 persons is substantial and provides the basis for finding that the Ames proposal is superior to that of Blair standing alone, based on population gained. See e.g., Oxford and New Albany, Mississippi, 3 FCC Rcd. 615, 616 (M.M. Bur. 1988) at paragraph 9. Population gain has been the deciding factor in cases where the difference was as little as 1,395 persons. See, Spring Grove and Preston, Minnesota, et al., 4 FCC Rcd. 5738 at paragraph 6 (M.M. Bur. 1989). Here, the increase in population gain is much more substantial and alone provides the basis for preferring the Ames Counterproposal. Lake City alone has a city population of 1,841 persons who would receive a first local service.

Moreover, when the additional public interest benefit of providing a first local regional service to Lake City, Iowa, (made possible by the Ames upgrade proposed) is considered, the benefits of preferring the Ames Counterproposal are compelling. Without this Counterproposal, Lake City could not have a channel allocated to it. See Channel Allocation Study attached as Exhibit 1. A proposal for first local service is entitled to the

second highest allotment priority as set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 91 (1982).

In this Counterproposal, Ames is requesting the modification of its license to operate Station KCCQ(FM) on Channel 286C3. Ames recognizes that the requested reallocation and license modification constitutes a non-adjacent channel upgrade. However, Ames respectfully submits that its request should be treated under the provisions of Section 1.420(g)(3) of the Commission's Rules as a proposal which constitutes an "incompatible channel swap." In its Report and Order in Modification of FM Broadcast Licenses to Higher Class Co-Channels or Adjacent Channels, 60 RR 2d 114, 120 (1986), the Commission "acknowledged that it will consider analogous proposals involving channel substitutions at other communities which would be necessary to create a mutually-exclusive relationship required under Section 1.420(g)(3), and [would] ... consider these 'incompatible channel swaps' on a case-by-case basis." See Pikeville, Kentucky, Clinchco, Virginia and Matewan, West Virginia, 6 FCC Rcd. 3732 (M.M. Bur. 1991), at f.n. 6. As detailed above, and as shown on Exhibit 1, Lake City, Iowa, may obtain its first regional broadcasting facility only if KCCQ abandons Channel 296A in Ames. Accordingly, an "incompatible channel swap" exists. Id.

Exhibit A constitutes a channel spacing study which clearly indicates that each of the reallocations requested herein can be made in full compliance with the separation requirements of the Commission's Rules. Moreover, to accommodate the incompatible

channel swap, Station KDSN(FM), Dennison, Iowa, must be reallocated to Channel 256A from 296A. Ames hereby states its intention to reimburse the licensee of Station KDSN, and such other stations as required by this Counterproposal and as the Commission may so determine, for the reasonable costs associated with the change in operating channels. Ames submits that its requested channel change qualifies as a "incompatible channel swap" pursuant to Section 1.420(g)(3) of the Commission's Rules because KCCQ's Channel 296 is the only manner by which an allotment may be made to Lake City, Iowa. See Pikeville, Kentucky, supra. There is a substantial priority and public interest benefit to allowing Lake City its first local service. Revision of FM Assignment Policies and Procedures, supra.


Conclusion

For the reasons stated, the Ames Counterproposal contained herein, should be approved by the Commission. Ames urges the Commission to issue an Order to Show Cause to KDSN for the purpose of modifying its license to specify Channel 256A and a further notice to show cause to Station KDLS-FM for the purpose of modifying its license to specify Channel 288A. As indicated above, Ames will reimburse KDSN for the reasonable costs of its channel change. Ames affirms its present intention to apply to modify Station KCCQ's license to specify operation on Channel 286C3. Ames further reaffirms its present intention to apply for

Channel 296C3 in Lake City, Iowa, and if authorized, to build a station promptly.

Respectfully submitted,

AMES BROADCASTING COMPANY

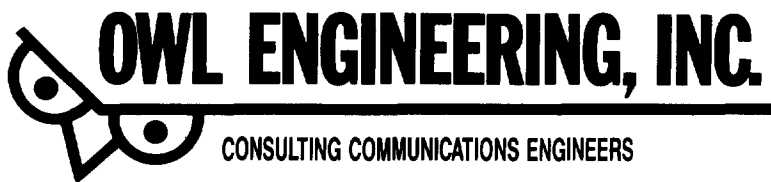
By: 
Gregg P. Skall
Its Attorney

Pepper & Corazzini
1776 K Street, N.W., Suite 200
Washington, DC 20006
(202) 296-0600

September 15, 1992

GPS/sb
c:\wp\potentl\ames.pet

EXHIBIT 1



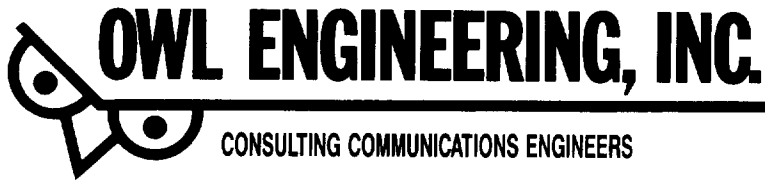
CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

September 8, 1992

Copyright, 1992, Owl Engineering, Inc. Copying of this material by persons, firms or corporations for the purpose of appropriating it for use in competing applications is expressly prohibited. Permission is granted to the FCC or other interested parties to copy all or portions of this material for study purposed only.



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

Owl Engineering, Inc. has been retained by "Ames" Broadcasting Co. (hereafter "Ames") to prepare this Engineering Statement in support of a counter proposal to the Proposed Rule Making MM Docket 92-155 petitioning the Commission to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Blair, NE	292A	268C3
Perry, IA	269A	286A
Sac City, IA	286A	248A
Storm Lake, IA	268C1	269C1

"Ames" offers this counter proposal to better serve the public interest. "Ames" proposes to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>	<u>Counter Proposed</u>
Blair, NE	292A	268C3	268C3
Perry, IA	269A	286A	288A
Sac City, IA	286A	248A	248A
Storm Lake, IA	268C1	269C1	269C1



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF "AMES" BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

The reference coordinates used for this study are:

Lake City, IA

42 16' 03" North Latitude
94 44' 01" West Longitude

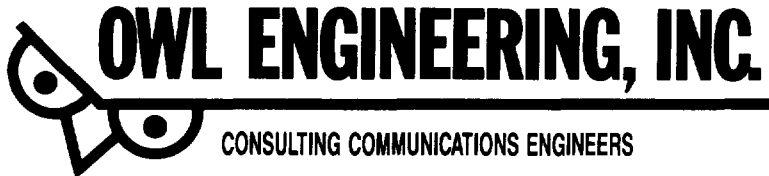
Ames, IA

42 04' 05" North Latitude
93 38' 13" West Longitude

All others as previously proposed or licensed.

"Ames's" proposal will provide Lake City, IA with regional first aural service while upgrading Ames, IA to a regional service Class C3 facility. Lake City has a population of 1,841 based on 1990 U.S. Census data.

An engineering study was performed, the results of which demonstrated that there is presently no channel which may be allocated to Lake City, Iowa. Accordingly, a channel could be allocated to Lake City, Iowa only by a channel swap such as that proposed in this Engineering Statement.



1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

The proposal of "Ames" was evaluated to determine if the proposed coordinates at Ames, Iowa would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1. As can be seen from Exhibit E-1, "Ames's" proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules.

The proposal of "Ames" was evaluated to determine if the proposed coordinates at Lake City would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-2. As can be seen from Exhibit E-2, the proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules. The proposed site at Lake City will provide 60 dBu (1 mV/m) signal coverage to a population of 43,208 encompassed by an area of approximately 4,782 square kilometers.

The proposal of "Ames" was evaluated to determine if KDSN-FM's coordinates at Denison would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-3. As can be seen from Exhibit E-3, "Ames's" proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules.



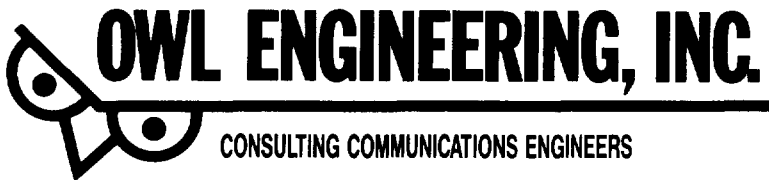
**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

The proposal of "Ames" was evaluated to determine if KDLS-FM's coordinates at Perry would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-4. As can be seen from Exhibit E-4, "Ames's" proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules.

A comparison of the area/population served by the 60 dBu coverage contour of the higher class channel at Ames to the Class A facilities was completed. Utilizing the reference Height Above Average Terrain (HAAT) and Effective Radiated Power (ERP) for each class of station, the following data was calculated:

Station Class	Area Served km ²	Population Served (1990 Census)
C3	4,760	135,568
A	2,481	94,171

Based on the above calculations, it can be determined that the proposed Class C3 facilities at "Ames" will increase the area served by 91.9 percent and the population served by 44 percent.



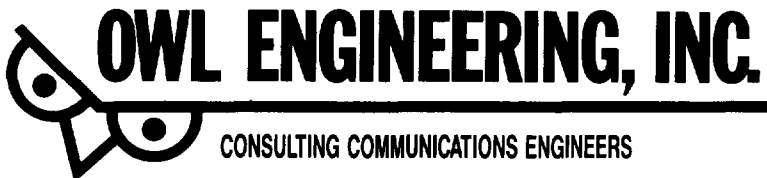
CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Lake City with a first aural full time regional broadcast service.
2. The proposal will provide Ames with a full time regional broadcast service.
3. 43,208 persons will be served by the 60 dBu contour from the proposed operations at Lake City.
4. The Class C3 facilities proposed at Ames will increase the area served by 91.9 percent and the population served by 44 percent.
5. The new channels proposed at Perry and Denison meet FCC spacing requirements set forth in section 73.207 of the FCC Rules at the licensed sites of KDLS-FM and KDSN-FM respectively.



CONSULTING COMMUNICATIONS ENGINEERS

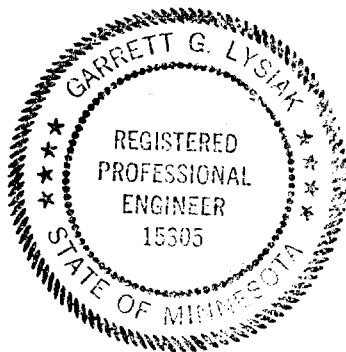
1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STATEMENT
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

AFFIDAVIT

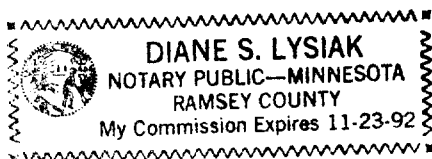
RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



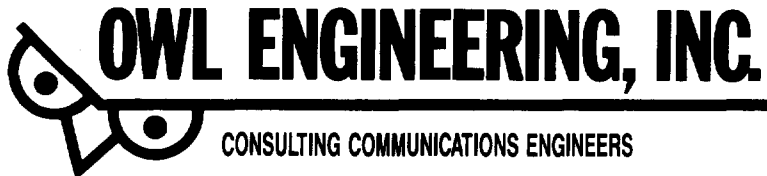
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date September 8, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1992



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING EXHIBIT E-1
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

CHANNEL STUDY FOR AMES, IA

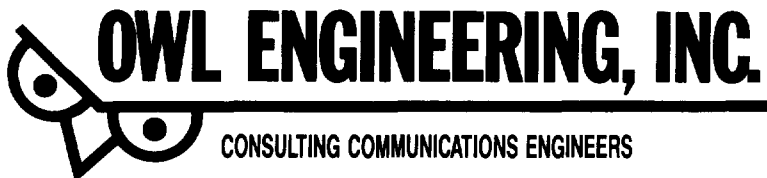
FM Channel 286-C3

LATITUDE: 42° 4' 5"
LONGITUDE: 93° 38' 13"

CHNL Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing °
232	NO CONFLICT					
233	NO CONFLICT					
283	NO CONFLICT					
284	NO CONFLICT					
285	FAIA Oskaloosa	C2	117.04	117	0.04	134.94
285	FAIA Hampton	A	92.32	89	3.32	23.46
285 KWGG	FMIA Hampton	A	92.32	89	3.32	23.46
285 KBOEFM	FMIA Oskaloosa	A	117.04	89	28.04	134.94
285 KDLSFM	FMIA Perry	A	42.26	89	-46.74	231.83*
285 KBOEFM	FMIA Oskaloosa	C2	117.04	117	0.04	134.94
286	FRIA Sac City	A	119.49	142	-22.51	289.62**
286 KDLSFM	FRIA Perry	A	42.26	142	-99.74	231.83*
287	FAIA Chariton	C2	120.61	117	3.61	166.04
288 KDLSFM	FRIA Perry	A	42.26	42	0.26	231.83
289 KOKZ	FMIA Waterloo	C	133.52	96	37.52	72.91
289	FAIA Waterloo	C	133.52	96	37.52	72.91

* KDLS to channel 288A per counter proposal.

** Sac City to channel 248A per counter proposal.



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING EXHIBIT E-2
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

CHANNEL STUDY FOR LAKE CITY, IA

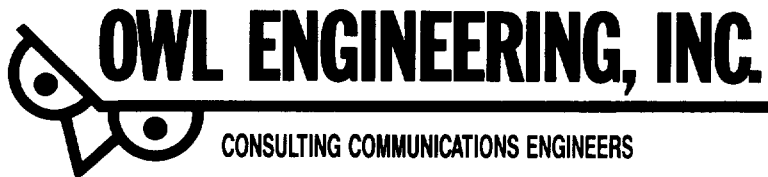
FM Channel 296-C3

LATITUDE: 42° 16' 3"
LONGITUDE: 94° 44' 1"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing °
242		NO CONFLICT					
243		NO CONFLICT					
293		NO CONFLICT					
294		FRIA Audubon	C3	54.43	43	11.43	188.70
294		FRIA Audubon	A	63.02	42	21.02	194.59
295		FAIA Osceola	C2	158.46	117	41.46	150.92
295	KJJC	FMIA Osceola	C2	155.83	117	38.83	152.02
296	KCCQ	FMIA Ames	A	90.03	142	-51.97	106.19*
296	KDSNFM	FMIA Denison	A	55.62	142	-86.38	242.63**
296		FANE South Sioux Cit	A	142.27	142	0.27	281.11
297		FAIA Forest City	C2	129.35	117	12.35	45.51
297	KIOW	FMIA Forest City	C2	132.61	117	15.61	47.14
298		NO CONFLICT					
299	KICDFM	FMIA Spencer	C1	105.44	76	29.44	341.52
299		FAIA Spencer	C1	105.44	76	29.44	341.52

* KCCQ to channel 286C3 per counter proposal.

** KDSNFM to channel 256A per counter proposal.



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING EXHIBIT E-3
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

CHANNEL STUDY FOR DENISON, IA

FM Channel 256-A

LATITUDE: 42° 2' 11"
LONGITUDE: 95° 19' 50"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing °
202		NO CONFLICT					
203		NO CONFLICT					
253	KQKQFM	FMIA Council Bluffs	C	99.63	95	4.63	215.73
253		FAIA Council Bluffs	C	96.69	95	1.69	207.27
254		NO CONFLICT					
255		FAIA Jefferson	A	78.52	72	6.52	91.17
255	KLSN	FMIA Jefferson	A	79.26	72	7.26	91.29
256	KEEZFM	FMMN Mankato	C1	224.08	200	24.08	19.17
256		FAMN Mankato	C1	224.08	200	24.08	19.17
257		NO CONFLICT					
258	KKMA	FMIA Le Mars	C1	91.18	75	16.18	303.31
258		FAIA Le Mars	C1	91.18	75	16.18	303.31
259		NO CONFLICT					



CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING EXHIBIT E-4
ON BEHALF OF AMES BROADCASTING CO.
IN SUPPORT OF A COUNTER PROPOSAL
CHANNEL 296C3 TO LAKE CITY, IOWA
CHANNEL 286C3 TO AMES, IOWA**

CHANNEL STUDY FOR PERRY, IA

FM Channel 288-A

LATITUDE: 41° 49' 58"
LONGITUDE: 94° 2' 15"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing °
234		NO CONFLICT					
235		NO CONFLICT					
285		NO CONFLICT					
286	KCCQFM	FRJA Ames	C3	42.26	42	0.26	52.00
287		FAIA Harlan	C3	105.28	89	16.28	257.18
287	KNOD	FMIA Harlan	C3	105.28	89	16.28	257.18
287		FAIA Chariton	C2	110.36	106	4.36	145.35
288	KELRFM	FMIA Chariton	A	110.36	115	-4.64	145.35*
288	KNOD	FMIA Harlan	A	105.28	115	-9.72	257.18**
289	KOKZ	FMIA Waterloo	C	173.63	165	8.63	67.61
289		FAIA Waterloo	C	173.63	165	8.63	67.61
290		NO CONFLICT					
291		NO CONFLICT					

* KELRFM has been ordered to channel 287C2 per MM Doc 89-264.

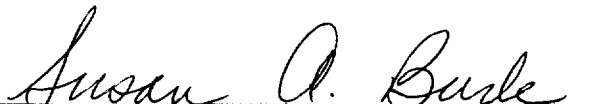
** KNOD has been ordered to channel 287 C3 per MM Doc 90-303.

CERTIFICATE OF SERVICE

I, Susan A. Burk, a secretary with the law firm of Pepper & Corazzini, do hereby certify that a true and correct copy of the foregoing "Counterproposal and Request for Order to Show Cause" was served on this 15th day of September, 1992, by U.S. mail, first-class, postage prepaid on the following individuals:

- * Michael C. Ruger, Chief
Allocations Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., ROOM 8318
Washington, DC 20554

Howard J. Braun, Esq
Rosenman & Cohn
1300 19th Street, N.W.
Washington, DC 20036
(Counsel for KBWH(FM), Blair, NB)
- KDSN(FM)
Box 670
1530 Ridge Road
Denison, IA 51442
- KDLS-FM
Box 548
Perry, IA 50220
- KAYL-FM
Box 1037
604-1/2 Lake Ave.
Storm Lake, IA 50588



Susan A. Burk

* - Via Hand Delivery